

1 LAURA VARTAIN (SBN: 258485)
laura.vartain@kirkland.com

2 **KIRKLAND & ELLIS LLP**
555 California Street, 30th Floor
3 San Francisco, CA 94104
Telephone: (415) 439-1625

4 ALLISON M. BROWN (Pro Hac Vice admitted)
allison.brown@kirkland.com
5 JESSICA DAVIDSON (Pro Hac Vice admitted)
jessica.davidson@kirkland.com

6 **KIRKLAND & ELLIS LLP**
601 Lexington Avenue
7 New York, NY 10022
Telephone: (212) 446-4723

8
9 *Attorneys for Defendants*
UBER TECHNOLOGIES, INC.,
10 RASIER, LLC, and RASIER-CA, LLC

11 *[Additional Counsel Listed on Following Pages]*
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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
LITIGATION

19 This Document Relates to:
20 ALL ACTIONS
21
22

Case No. 3:23-md-03084-CRB

**DEFENDANT UBER TECHNOLOGIES,
INC., RAISER, LLC, AND RAISER-CA,
LLC'S BRIEF IN SUPPORT OF UBER'S
PRIVILEGE CLAIMS CHALLENGED BY
PLAINTIFFS FOR THE BUSHRA FAIZ
CUSTODIAL FILE – PURSUANT TO
SPECIAL MASTER ORDER NO. 3 (DKT.
2472)**

Pursuant to Special Master Order No. 3, I (4) (Dkt. 2472), Defendants submit this brief in support of their position on the remaining privilege challenges for custodian Bushra Faiz. On March 25, 2025, Plaintiffs challenged approximately 29 documents within this custodial file. Through conferrals, the parties have narrowed their dispute to 7 challenges. These challenges are now submitted for the Special Master's review.

Defendants incorporate by reference the legal standard and arguments set forth in their prior briefing (Dkts. 2433, 2461, 2528, 2544, and 2580). As explained more fully in the prior briefs, the applicable legal standard and the factual material previously provided to the Special Master,¹ when reviewed in conjunction with the challenged documents and the associated metadata fields, support Uber's privilege and work product assertions. The remaining privilege claims submitted for the Special Master's determination should be upheld.

DATED: April 18, 2025

Respectfully submitted,

SHOOK HARDY & BACON L.L.P.

By: /s/ Maria Salcedo

MARIA SALCEDO

KIRKLAND & ELLIS LLP

LAURA VARTAIN

ALLISON M. BROWN

JESSICA DAVIDSON

O'MELVENY AND MYERS LLP

SABRINA STRONG

JONATHAN SCHNELLER

SHOOK, HARDY, & BACON, LLP

PATRICK OOT (Admitted *Pro Hac Vice*)

oot@shb.com

1800 K St. NW Ste. 1000

Washington, DC 20006

Telephone: (202) 783-8400

Facsimile: (202) 783-4211

¹ As requested by the Special Master, Uber has provided (1) a glossary of terms commonly used in disputed documents, (2) a list of names and titles of relevant Uber inside and outside counsel, and (3) a digest of third-parties present in its privilege log. Defense counsel will also be available for any questions the Special Master may have during the review process.

1 ALYCIA A. DEGEN (SBN: 211350)
2 adegens@shb.com
3 MICHAEL B. SHORTNACY (SBN: 277035)
4 mshortnacy@shb.com
5 2121 Avenue of the Stars, Suite 1400
6 Los Angeles, CA 90067
7 Telephone: (424) 285-8330
8 Facsimile: (424) 204-9093

9 CHRISTOPHER V. COTTON (Admitted *Pro Hac*
10 *Vice*)
11 ccotton@shb.com
12 MARIA SALCEDO (Admitted *Pro Hac Vice*)
13 msalcedo@shb.com
14 2555 Grand Blvd.
15 Kansas City, MO 64108
16 Telephone: (816) 474-6550
17 Facsimile: (816) 421-5547

18 *Attorney for Defendants*
19 UBER TECHNOLOGIES, INC.,
20 RASIER, LLC, and RASIER-CA, LLC
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27
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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Maria Salcedo
MARIA SALCEDO